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10 *Attorneys for Defendants,*
11 *Flamingo 316, LLC, Dadon Condos, LLC, Tom Dadon, as Trustee*
12 *of T&D Nevada Trust, Daniela Dadon, as Trustee of T&D Nevada Trust,*
13 *Meridian Resorts LLC and 220 East Flamingo Unit 316 Series*

14 **UNITED STATES DISTRICT COURT**

15 **FOR THE DISTRICT OF NEVADA**

16 HSBC BANK USA, N.A. AS TRUSTEE
17 FOR PHH 2007-3,

18 Case No.: 2:17-cv-02400-JAD-NJK

19 Plaintiff,
20 vs.

21 **STIPULATION TO EXTEND TIME TO**
22 **RESPOND TO PLAINTIFF HSBC BANK**
23 **USA, N.A.'S COMPLAINT**

24 **(First Request)**

25 FLAMINGO 316, LLC, a series of Nevada
26 Rental Holdings, LLC; MERIDIAN
27 PRIVATE RESIDENCES HOMEOWNERS
28 ASSOCIATION, a Nevada non-profit
corporation; DADON CONDOS, LLC;
TOM DADON and DANIELA DADON,
Trustees of the T&D BEVADA TRUST;
MERIDIAN RESORTS LLC, 220 E.
FLAMINGO UNIT 316 SERIES;
RICHARD COHEN and individual; IRIS
COHEN, an individual,

29 Defendants.

30 IT IS HEREBY STIPULATED by and between Plaintiff HSBC BANK USA, N.A. AS
31 TRUSTEE FOR PHH 2007-3 (hereinafter "HSBC") and Defendants, FLAMINGO 316, LLC,
32 DADON CONDOS, LLC, TOM DADON, AS TRUSTEE OF T&D NEVADA TRUST, DANIELA
33 DADON, AS TRUSTEE OF T&D NEVADA TRUST, MERIDIAN RESORTS LLC AND 220
34 EAST FLAMINGO UNIT 316 SERIES (hereinafter Flamingo 316, LLC, Dadon Condos, LLC, Tom

Dadon, as Trustee of T&D Nevada Trust, Daniela Dadon, as Trustee of T&D Nevada Trust, Meridian Resorts LLC and 220 East Flamingo Unit 316 Series shall be referred to collectively as the “Parties” through their respective counsel of record as follows:

WHEREAS, HSBC filed its Complaint on September 13, 2017.

WHEREAS, Parties retained Luis A. Ayon, Esq. of Ayon Law, PLLC as counsel of record on October 5, 2017.

WHEREAS, counsel for HSBC was notified of the Parties representation via email on October 5, 2017 and counsel for HSBC informed Luis A. Ayon, Esq. that the Parties were individually served with the Complaint on September 18th & 19th, respectively.

WHEREAS, the Parties' responsive pleading is due to HSBC's Complaint on Monday, October 9, 2017 and HSBC and the Parties are discussing potential settlement of this matter. Therefore, the additional time will allow counsel to have further discussions toward that resolution.

WHEREAS, The Parties stipulate as follows:

IT IS HEREBY AGREED AND STIPULATED between HSBC and the Parties, by and through their undersigned attorneys, that the Parties shall have up to and including October 23, 2017 to file its responsive pleading to Plaintiff's Complaint.

This is the Parties first request for an extension of time to file their responsive pleading to Plaintiff's Complaint and is not intended to cause any delay or prejudice to any Party.

Approved as to Form and Content:

DATED this 10th day of October, 2017.

DATED this 10th day of October, 2017.

AYON LAW, PLLC

BALLARD SPAHR LLP

/s/ Luis A. Ayon
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/s/Holly Ann Priest
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ORDER

Pursuant to the above Stipulation of HSBC and the Parties, it is ORDERED that:

1. The Parties shall have up to and including October 23, 2017 to file its responsive pleading to Plaintiff HSBC's Complaint.

DATED October 11, 2017.

United States Magistrate Judge